

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF:**

**CHAPTER 13:**

**LATASHIA CHINITA PARROTT**

**CASE NO. 23-01983 JAW**

**TRUSTEE’S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW, Semoune Ellis on behalf of Torri Parker Martin, the duly appointed and qualified Standing Trustee in the above cause and files this Response to Motion for Relief from Stay (Docket #49) and in support thereof, would show unto the Court the following:

1. The Debtor’s petition was filed August 30, 2023. The plan was confirmed on November 6, 2023 (Docket #26).
2. The proposed plan indicates the Debtor will pay the monthly mortgage direct to Nationstar Mortgage, LLC, (hereinafter “Creditor;” Claim 5-1) (Docket #26).
3. The confirmed plan includes a pre-petition mortgage arrears amount (Docket #26).
4. An Objection (Docket #31) was filed indicating the prepetition arrears amount had been satisfied. Subsequently, an Agreed Order was entered rendering the Objection moot.
5. On May 23, 2025, the Creditor filed its Motion for Relief from Automatic Stay (Docket #62) stating that the Debtor has defaulted on the monthly mortgage loan payments (January 2025 – May 2025) and the loan is delinquent in the amount of \$5,976.05 for a total of \$6,719.18 including fees and cost.
6. The Debtor has completed twenty-one (21) of sixty (60) plan term months.
7. The Debtor’s plan payments are current.
8. The Code provides that Debtors will be able to make all plan payments and comply with the plan. (11 U.S.C. § 1325(a)(6)). (emphasis added).

9. The Code further provides that, “the trustee shall make payments to the creditors under the plan.” (11 U.S.C. § 1326(c)).
10. Accordingly, the Debtor should be required to modify the Chapter 13 Plan to include the monthly mortgage loan payments and fees and cost to be paid to the Creditor through the plan (Claim 5-1).

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Response be received and considered and at the hearing hereon an Order be entered requiring the Debtor to modify the Chapter 13 Plan to include the monthly mortgage loan payments and fees and cost to be paid to Nationstar Mortgage, LLC (Claim 5-1) through the plan; and any other general relief to which the Trustee and this bankruptcy estate may be entitled.

DATED: June 11, 2025

Respectfully Submitted,

/s/ Semoune Ellis  
Semoune Ellis MSB# 105303  
Staff Attorney for  
Standing Chapter Thirteen Trustee  
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**CERTIFICATE OF SERVICE**

I, Semoune Ellis, do hereby certify that I have this day submitted a true and correct copy of the above and foregoing Response to the following, all by electronic, ECF filing, to: Abigail Marbury, Asst. U. S. Trustee, USTPRegion05.JA.ECF@usdoj.gov, 501 E. Court Street, Suite 6.430, Jackson, MS 39201, and

**Attorney for Creditor (Nationstar Mortgage, LLC):**

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DATED: June 11, 2025

/s/Semoune Ellis

Semoune Ellis